

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|-----------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, |) | |
| Plaintiff, |) | Civil Action No. 21-514-MN |
| CONNECTIONS COMMUNITY |) | |
| SUPPORT PROGRAMS, INC.; |) | |
| CATHERINE DEVANEY MCKAY; |) | |
| WILLIAM NORTHEY; and STEVEN |) | |
| DAVIS, |) | |
| Defendant. |) | |
| |) | |

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

The undersigned, the United States of America (the “United States”), and Don A. Beskrone, Chapter 7 trustee (the “Trustee”) for the estate of Connections Community Support Programs, Inc., (“Connections”) hereby file this joint motion for entry of a consent judgment against Connections Community Support Programs, Inc., and in favor of the United States of America. In support thereof, the parties state as follows:

1. On April 9, 2021, the United States filed a Complaint against Connections, Catherine Devaney McKay, William Northey, and Steven Davis (D.I. 1).

2. The Complaint alleges that the Defendants negligently failed to comply with statutory and regulatory requirements under the Controlled Substances Act, 21 U.S.C. § 801, *et seq.* More specifically, the Complaint alleges that the Defendants failed to accurately account for large volumes of controlled substances, and failed to properly track and document transfers of controlled substances.

3. On April 19, 2021, Connections filed a voluntary Chapter 11 bankruptcy petition in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”),

initiating the case captioned *In re Connections Community Support Programs, Inc.*, Case No. 21-10723-MFW.

4. On July 30, 2021, Connections filed in the Bankruptcy Court a Motion to Approve Compromise under Rule 9019, seeking an order approving a settlement agreement (the “Settlement Agreement”) by and between Connections and the United States.¹

5. On September 27, 2021, the Bankruptcy Court entered an Order approving the settlement and authorizing Connections and the United States to execute the Settlement Agreement and to submit the attached Consent Judgment resolving the United States’ claims against Connections (and Connections alone) in the present case. By its terms, the Order was made binding on the bankruptcy estate and upon successors to the Debtor.

6. Also on September 27, 2021, Connections’ bankruptcy was converted from a Chapter 11 case to a case under Chapter 7 of the Bankruptcy Code. The undersigned, Don A. Beskrone, was appointed as Chapter 7 Trustee on that date.

7. The Trustee, as representative of Connections’ estate, has executed the present Motion indicating his consent to entry of the attached Consent Judgment.

¹ Defendants McKay, Northey, and Davis are not parties to the Settlement Agreement.

WHEREFORE the parties respectfully request the Court grant this Motion and enter the enclosed Consent Judgment in the present case, and that the Court grant such other and further relief as is just and proper.

Respectfully submitted,

DAVID C. WEISS
UNITED STATES ATTORNEY

cc: Laura D. Hatcher

Dylan J. Steinberg
Laura D. Hatcher
Assistant United States Attorneys
1313 N. Market Street
PO Box 2046
Wilmington, DE 19899-2046

Attorneys for Plaintiff United States of America

DON A. BESKRONE, CHAPTER 7
TRUSTEE FOR THE ESTATE OF
CONNECTIONS COMMUNITY
SUPPORT SERVICES, INC.

1st  10/26/21

Ricardo Palacio (No. 3765)
Ashby & Geddes
500 Delaware Avenue
8th Floor
Wilmington, DE 19801

*Proposed Counsel for Don A. Beskrone
Chapter 7 Trustee*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|-----------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | Civil Action No. 21-514-MN |
| Plaintiff, |) | |
| |) | |
| CONNECTIONS COMMUNITY |) | |
| SUPPORT PROGRAMS, INC.; |) | |
| CATHERINE DEVANEY MCKAY; |) | |
| WILLIAM NORTHEY; and STEVEN |) | |
| DAVIS, |) | |
| |) | |
| Defendant. |) | |
| |) | |

CONSENT JUDGMENT

Judgment is hereby entered against Defendant Connections Community Support Programs, Inc. (“Connections”) in the amount of \$1,621,571, and interest at a rate 2.5% per annum from the date of July 22, 2021, continuing until and including the day of payment, in favor of the United States and against Connections (the “Judgment”). The United States’ claims shall continue against the remaining Defendants.

IT SO ORDERED.

UNITED STATES DISTRICT JUDGE